

EPA Region 5 Records Ctr



350013

ATTACHMENT 7

Ohio EPA

Re: Montgomery County
Hazardous Materials
TRW Inc. ←
OHDO41066325
G

*New
file*

Mr. Ike Beediwala
TRW Incorporated
1784 Stanley Avenue
Dayton, Ohio 45404

February 7, 1984

Dear Mr. Beediwala:

On 1 February 1984, this office conducted an inspection of your facility to determine your compliance with the Ohio Hazardous Waste Rules. During the inspection it was determined that your facility is a generator with storage of less than 90 days. The following is a list of violations found during the inspection:

(OAC - Ohio Administrative Code)

- OAC 3745-52-34(A)(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
- (A)(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste"; and
- (A)(4) The generator complies with the requirements for owners or operators concerning "Preparedness and prevention" and "Contingency Plan and Emergency Procedures" in Chapter 3745-65 of the OAC and with Rule 3745-65-16 of the OAC
- OAC 3745-65-16 Personnel Training Plan
- OAC 3745-65-35 Adequate aisle space shall be maintained to insure access to each drum during an emergency



Re: Montgomery County
Hazardous Materials
TRW, Incorporated
OHDO41066325
G

Mr. Ike Beediwala
TRW, Incorporated
1784 Stanley Avenue
Dayton, Ohio 45404

April 16, 1984

Dear Mr. Beediwala:

On 13 April 1984, I visited your facility to determine your progress in meeting your compliance date of 7 May 1984. During the visit, I found the following violations cited in my 7 February 1984 letter corrected:

OAC 3745-52-34(A)(2)

Accumulation start date

(A)(3)

Marking drums with the
words "hazardous waste"

OAC 3745-65-35

Adequate aisle space

The remaining violations are still outstanding but progress was noted.

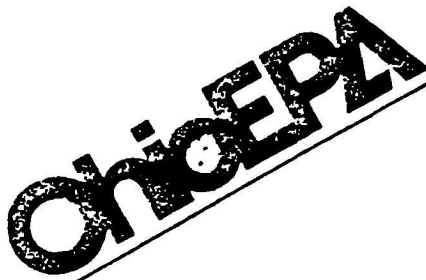
If you have any questions, please feel free to contact me at (513) 461-4670.

Sincerely,

David P. Duell
Hazardous Materials Management

DPD:lmr

cc: Paula Cotter, OEPA, DHMM



Re: Montgomery County
Hazardous Materials
TRW, Incorporated
OHD 041066325
G

Mr. Ike Beediwala
TRW, Incorporated
1784 Stanley Avenue
Dayton, Ohio 45404

June 8, 1984

Dear Mr. Beediwala:

This is to acknowledge receipt and review of your draft contingency plan and personnel training plan. The review shows the following items should be added to each plan:

1. A schedule of how often training will occur for existing employees and initial training for new employess,
2. Include the names, job title and job description of those employees actually involved in the handling of hazardous wastes.
3. Sections 5.1 and 5.4 need to be detailed more as to the decision making process,
4. Change Ohio EPA emergency phone number to 1-800-282-9378.

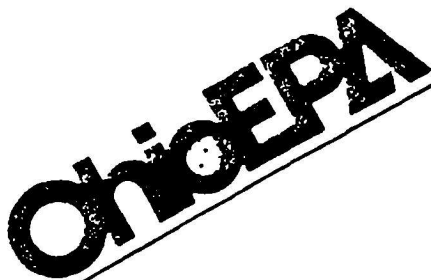
The above changes must be incorporated into a final document and submitted to this office by 29 June 1984.

If you have any questions, please feel free to contact me.

Sincerely,

David P. Duell
Solid and Hazardous Waste Management

DPD:lmr



Re: Montgomery County
Hazardous Wastes
TRW, Incorporated
OHD 041066325
G

Mr. Ike Beediwala
TRW, Incorporated
1784 Stanley Avenue
Dayton, Ohio 45404

July 11, 1984

Dear Mr. Beediwala:

This is to acknowledge receipt and review of your recently submitted Contingency Plan as required by the Ohio Hazardous Waste Rules. A detailed review of the plan shows it to be in compliance with the present rules.

Your facility is now in substantial compliance with the Ohio Hazardous Waste Rules.

If you have any questions, please feel free to contact me if you have any questions.

Sincerely,

David P. Duell
Solid and Hazardous Waste Management

DPD:lmr

cc: Paula Cotter, DSHWM, Central Office

For the calendar year ending December 31, 19 85

(specify facility to which all wastes on the page were sent)

T/AC

C0HD0410663252
1 2 13 14 15

X. FACILITY NAME

E C O L O T E C , I N C
28

1613161 N I R W I N S T R E E T

D A Y T O N O H 4 5 4 0 5

State/Zip Code

Line	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS		C. USEPA HAZARDOUS WASTE NUMBER (see instructions)		D. AMOUNT OF WASTE	E. UNIT OF MEASURE
1	NITRIC ACID - AMMONIUM BIFLUORIDE	16	0 2	D 0 0 2		1 7 0 5 0	P
2	MURIATIC ACID 15.0 - 15.0	0	2	D 0 0 2		2 2 0 0	P
3	SULFURIC ACID	0	2	D 0 0 2		2 7 5 0	P
4	CHROMIC ACID	0	2	D 0 0 2		4 9 5 0	P
5	COOLANT - WATER	none		Non hazardous		8 1 8 4 0	P
6	MIXED SOLVENTS	0	1	D 0 0 1		4 6 2 0	P
7	STODDARD SOLVENT	0	1	D 0 0 1		4 2 3 5	P
8	1,1,1, TRICHLOROETHYLENE			F 0 0 1		7 1 5 0	P
9. COMMENTS		28	29	30	31	32	33

XIII. COMMENTS (enter information by section number)

see lines 9, 10 and 11 on next page



O'BRIEN & GERE

April 25, 1986

OVERNIGHT DELIVERY

Mr. Ike Beediwala
Plant Engineer
Motor Division
TRW Electronic Components Group
1784 Stanley Avenue
Dayton, OH 45404

Re: Soil Sample Analytical Results

File: 2795.017 #2

Dear Mr. Beediwala:

Enclosed please find the analytical results of soil samples collected during the underground storage tank removal work on April 4, 1986. For each of the parameters analyzed, the concentrations indicated were well below the limits for RCRA hazardous waste levels as defined by the U.S. Environmental Protection Agency (USEPA). A summary of the analytical results is as follows:

<u>Sample I.D. No.</u>	<u>Sample Location</u>	<u>Analytical Parameter</u>	<u>Analytical Results</u>
Soil No. 1	Excavated Soil Stockpile	Total Solids	82.38%
		Total PCBs	<.05 mg/kg
		EP Toxicity: (all results in mg/kg)	
		Silver	<0.03
		Barium	0.750
		Cadmium	<0.020
		Chromium	0.068
		Arsenic	<0.025
		Mercury	<0.002
Soil No. 2	Soil Left in Place	Lead	<0.200
		Selenium	<0.025
Soil No. 2	Soil Left in Place	Oil and Grease	271 mg/kg
		Total Solids	82.4%
Soil No. 3	Soil Left in Place	Oil and Grease	136 mg/kg
		Total Solids	88.7%

The results for the stockpiled soils should be reported on the "Solid Waste Disposal Questionnaire" form required by the Ohio EPA. This form must be completed and approved by the Ohio EPA prior to disposal of the stockpiled soil.

Mr. Ike Beediwala

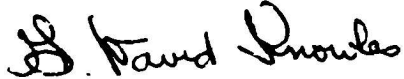
April 25, 1986

Page 2

Should you have further questions about the form or other aspects of the project, please do not hesitate to call Craig Butler or me.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.

A handwritten signature in dark ink, appearing to read "G. David Knowles". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

G. David Knowles, P.E., L.S.
Managing Engineer

CFB/kag

cc: C. T. Bingham - TRW, Corporate
C. B. Murphy, Jr. - O'Brien & Gere



BCM Laboratory Division

521 W GERMANTOWN PIKE
NORRISTOWN, PA 19401
215-825-0447

PLEASE REMIT CHECKS TO:
BCM Eastern Inc.
1 PLYMOUTH MEETING
PLYMOUTH MEETING, PA 19462
215-825-3800

CLIENT

TRW - Dayton, OH
2795.017 125

O'Brian & Gere
Attn: Craig Butler
One Valley Square, Suite 200
512 Townshipline Road
Blue Bell, PA 19422

DATE : 04/18/86
BCM # : - -
P.O.# :
ORDER : 04796

FINAL REPORT

PAGE : 1

~~This is the final report for the samples shown below. If you have any questions concerning this report please call 215-825-0447.~~

BCM NUMBER	606663	606664	
CLIENT SAMPLE ID	1	2	
DATE SAMPLED	04/04/86	04/04/86	
DATE RECEIVED	04/08/86	04/08/86	
METHOD AND TEST	UNITS	RESULTS	RESULTS
6 Oil & Grease (Freon Extractables)	mg/kg	271	136
48 Total Solids	%	82.4	88.7

LAB CERTIFICATION:

EPA/PA - #38007

NJ - #77175

EPA BULK ASBESTOS QC - #3339

AL - #40300

AIHA/NIOSH - #241/19401

METHOD DESCRIPTION

6 EPA # 413.1

METHOD DESCRIPTION

48 EPA # 160.3

* END OF REPORT *

RECEIVED

APR 21 1986

O'BRIEN & GERE
PHILADELPHIA, PA



State Of Ohio Environmental Protection Agency

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086

(513) 449-6357



Richard F. Celeste, Governor

April 30, 1986

Re: SOIL SAMPLES
TRW, INC.
OHD041066325
G

Mr. Ike Beediwala
TRW, Inc.
1784 Stanley Avenue
Dayton, OH 45404

Dear Mr. Beediwala:

After reviewing the soil sample results, we have concluded this material to be disposed of at any sanitary landfill site.

If you have any questions please contact me directly at (513) 449-6357.

Cordially,

A handwritten signature in cursive script, reading "Richard Robertson".

Richard Robertson
Solid & Hazardous Waste Management Unit

RR/1a1



State of Ohio Environmental Protection Agency

Southwest District Office

7 East Fourth Street
Dayton, Ohio 45402-2086
(513) 449-6357



June 24, 1988

Re: TRW INC., GLOBE MOTORS
HAZARDOUS WASTE MANAGEMENT
OHD 041 066 325
MONTGOMERY COUNTY
GENERATOR

Richard F. Celeste
Governor

Mr. Ike Beediwala
Plant Engineer
TRW Inc.
1784 Stanley Ave.
Dayton, Ohio 45404

Dear Mr. Beediwala:

On June 22, 1988, I visited your facility to conduct a Hazardous Waste Generator Inspection in accordance with State and Federal Hazardous Waste Rules and Regulations.

During the compliance inspection, the following violations/deficiencies were found (OAC - Ohio Administrative Code, CFR - Code of Federal Regulations):

1. The containers located at the accumulation area were not being provided with adequate aisle space to allow unobstructed movement of emergency or spill control equipment. This is a requirement of CFR 265.35 and OAC 3745-65-35. To correct this violation, your company must provide the necessary aisle space immediately.
2. There were seven containers that were being stored beyond the 90 days accumulation limit for a generator. The applicable requirements are CFR 262.34 and OAC 3745-52-34. Storage of hazardous waste beyond the 90 days requires a hazardous waste storage permit. To correct this violation, your company must have all containers that are beyond the 90 days taken off-site to a permitted facility by July 23. Photocopy(ies) of the hazardous waste manifest must be received in this office by July 26.
3. Your company's weekly inspection log does not indicate any corrective measures taken against any problems occurring with containers. Even though one log in date showed a leaking drum,

Mr. Ike Beedliwala
June 24, 1988
Page 2

the corrective measure was not recorded. This is a requirement of CFR 265.174 and 3745-66-74. To correct this deficiency, your company must prepare a new log where any corrective measures can be indicated on the form. Submit a photocopy to this office by July 26.

Having reviewed your company's hazardous waste manifests, there were no indications that any plating sludge wastes were being shipped off-site. Please clarify your company's plating process and the waste streams generated from it. Include the explanation along with the other requests.

On the day of the inspection, a RCRA Land Disposal Restriction Inspection was conducted. Your company's plating operation may be generating wastes indicated on the California List Wastes. Your company must submit sample analysis data of waste streams generated from the plating operation to this office by July 26. If there are no data available, please include an explanation as to why there are not any.

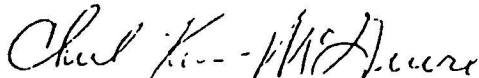
Failure to list any other violations/deficiencies does not relieve your company from meeting hazardous waste rules and regulations.

Any violations cited above may result in further enforcement by Ohio EPA or USEPA.

Please find enclosed photocopies of inspection forms used for your company.

Should you have any questions, I may be contacted at 449-6357.

Sincerely,



Chul Kim-McGuire
Division of Solid & Hazardous Waste Management

cc: Dave Sholtis, CO, DSHWM

6/22/88 1010
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

HWFAB #

U.S. EPA I.D. # OHD 041064325

Facility: TRW INC - FLUPL MOTORS Address: 1784 STANLEY AVE. City: DAYTON
State: Ohio Zip Code: 45404 County: MONTGOMERY Telephone: (513) 228-3171

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>IKE BEEDIWALA</u>	<u>PLT. ENGINEER</u>	<u>(513) 228-3171 EXT. 390</u>
2.	<u>MARK SEITZ</u>	<u>MAINTENANCE TECH.</u>	<u>" - "</u>
3.	<u>JACK PHILABAUH</u>	<u>" "</u>	<u>" "</u>

INSPECTOR(S)

1.	<u>Chad McQuinn</u>	<u>WMT/EEI</u>	<u>(513) 440-6257</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☒ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/
Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	—	—	✓	—
2. If "yes", is it complete and accurate?	—	—	✓	—
3. Has the facility submitted a Part B?	—	—	✓	—
4. Was advance notice of the inspection given? If so, how far in advance?	—	✓	—	—

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Previous inspection: 4/15/86

Waste streams { DC01, DC02, FC01, FC03
FC05, FC07

Manufactures motors (parts) for
cruise missiles

Uses { Safety-Kleen Corp. OHD980587364
Ecolab, Inc. OHD980700942

Industrial Chemical Mgt. OHD981088545

FC07 → Cyanamid, Inc. MI DC98011992

A & B Industrial MIDG17167222

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u> </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (<u>recycle</u> /reuse)?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>1,1,1 Trichloro- ethylene Oil sludge bottoms sent out as hazardous waste</u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01].	<u>—</u>	<u>✓</u>	<u>—</u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<u>✓</u>	<u>—</u>	<u>—</u>	<u> </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u>✓</u>	<u>—</u>	<u>—</u>	<u> </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u>✓</u>	<u>—</u>	<u>—</u>	<u> </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<u>—</u>	<u>—</u>	<u>✓</u>	<u> </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<u>✓</u>	<u>—</u>	<u>—</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. The generator meets the following hazardous waste pre-transport requirements:

- a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]
- b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].
- c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]

*** SEE GENERATOR- PAGE 3

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:

- a) The containers are clearly marked with the words "Hazardous Waste".
- b) The date that accumulation began is clearly marked on each container.

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

* * 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
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Refresher - need to properly document the training

9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
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RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

On the day of the inspection the following were found
in the storage compound:

1,1,1 TCA

- 1 Containers *
beyond 90-days
Generator exclusion
- a) Accumulated drums with the following dates (12-87,
3-17-88, 2-2-88, waste flammable - 10/21/88); 55 gallon
containers.
 - b) Accumulated drums with the following dates (xylene -
12-4-87, 2-29-88, paint related material - 12/4/87);
30 gallon containers.
 - c) There were nine drums of acid wastes. No USEPA
waste codes written on the hazardous waste label;
however, it did contain DOT designations.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ✓ — —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. ✓ — — —
 - b) Access to telephone, radio or other device for summoning emergency assistance. ✓ — — Alarm
 - c) Portable fire control equipment. ✓ — — —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ✓ — — —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ✓ — — Monthly
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ✓ — — Alarm
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] — ✓ — —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ✓ — — —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓
 - b) Arrangements or agreements with local or state emergency authorities. ✓
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<u>✓</u>	—	—	—
b) In good physical condition (265.171) [3745-66-71]	<u>✓</u>	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>✓</u>	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<u>✓</u>	—	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u>✓</u>	—	—	—
* * * 4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<u>✓</u>	—	—	<u>inadequate</u>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>✓</u>	—	—	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>✓</u>	—	—	—

2275 Stanley Avenue
Dayton, Ohio 45404
513-228-3171
TWX 810-459-1642
TELEX: 288224
FAX 513-229-8531

C. L. M. / J. M.
GLOBE MOTORS

July 20, 1988

Mr. Chul Kim-McGuire
Div. of Solid & Hazardous Waste Management
Ohio EPA
Southwest District Office
7 East 4th Street
Dayton, OH 45402-2086

Re: Your letter dated June 24, 1988

Dear Mr. McGuire:

Following is the itemized list of violations/deficiencies found during your inspection of our 1784 Stanley Avenue facility on June 22, 1988, and corrective measures which have been taken to comply in accordance with regulations.

1. The containers located at the accumulation area without adequate aisle space.

This violation has been corrected by rearrangement of stored drums. Sample pictures are attached for example.

2. Seven containers stored beyond the 90 days accumulation limit for a generator.

The following containers, including the seven above, were transported to off-site permitted facilities for disposal as noted:

<u>Item</u>	<u>Manifest #</u>	<u># Drums</u>	<u>Description</u>	<u>Ship Date</u>	<u>Facility</u>
1	01033	1	Waste Xylene	6-23-88	Ecolotec, Inc.
2	01033	1	Waste Xylene	6-23-88	Ecolotec, Inc.
3	01033	1	Flammable Liquid	6-23-88	Ecolotec, Inc.
4	01033	1	Waste Paint	6-23-88	Ecolotec, Inc.
5	01034	4	Stoddard Solvent	7-08-88	Safety Kleen
6	01034	8	Trichloroethane 111	7-08-88	Safety Kleen
7	01036	2	Varnish-Flammable	7-19-88	Ecolotec, Inc.

Photocopies of above hazardous waste manifests are attached.

3. Our company's weekly inspection log did not indicate any corrective measures taken against any problems occurring with containers.

Our company has corrected this deficiency by preparing a new log, where corrective measures have been indicated on the form. This log went into effect the week of 7-18-88. A photocopy of this form is attached.



In addition to the above three items listed, there were two questions you addressed which we have attempted to clarify below:

- A. Our company's plating process, which generates an effluent wastewater stream, does not go through any waste treatment prior to discharge into POTW. Therefore, no plating sludge waste of any kind is being generated. Our waste stream is in complete compliance with federal and local pretreatment standards. We are required by the City of Dayton to file a monthly self-monitoring report. The latest copy of one such report is attached. We are also required to submit a monthly report form to the Ohio EPA on our storm sewer under the requirement of NPDES permit No. 1IN00038001. The latest copy of one such report is attached.
- B. The waste generated from our plating operation gets analyzed by the TSD facilities before it is shipped and RCRA's Land Disposal Restriction (F Solvent) and California List Waste are properly identified. We do not always receive a copy of the sample analysis from TSD if it has already been analyzed recently and is typical of sampled waste. We maintain copies of recent analysis of typical waste copies which are attached. Also attached are copies of Land Disposal Restriction and California List Waste forms, which get accompanied to the appropriate manifests.

We hope that the above corrective actions, explanations and the attached supporting documentation will relieve our company from the violations/deficiencies listed from your inspection.

Please contact us at (513) 228-3171, Ext. 390 for any questions you may have. Your written response will be appreciated.

Sincerely,


Ike Beediwala,
Plant Engineer

cc: Steve McHenry
Wayne Chelius

Attachments

IB/jaa

File
TRW
Motors



State Of Ohio Environmental Protection Agency

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086



(513) 449-6357

Richard F Celeste, Governor

July 10, 1986

Mr. Pete Capponi
O'Brien-Gere Engineers
1304 Buckley Road
Syracuse, New York 13221

Dear Mr. Capponi:

After reviewing the soil sample results from TRW, Inc. on 1784 Stanley Avenue, Dayton, Ohio, we have determined them to not be contaminated. These soils may remain in situ or used as fill.

If you have any questions concerning this matter, please contact me directly at (513) 449-6357.

Cordially,

A handwritten signature in cursive script that reads "Richard Robertson".

Richard Robertson
Solid and Hazardous Waste Management Unit

RR/dkp

cc: Ike Beediwala, TRW, Inc.



State of Ohio Environmental Protection Agency

Southwest District Office

7 East Fourth Street
Dayton, Ohio 45402-2086
(513) 449-6357



Richard F. Celeste
Governor

July 26, 1988

Re: TRW INC., GLOBE MOTORS
HAZARDOUS WASTE MANAGEMENT
OHD 041 066 325
MONTGOMERY COUNTY
GENERATOR

Mr. Ike Beediwala
Plant Engineer
TRW Inc.
1784 Stanley Ave.
Dayton, Ohio 45404

Dear Mr. Beediwala:

Thank you for your submittal of July 20 to correct violations cited in an inspection letter dated June 24. The documents were received in this office on July 22.

Violations pertaining to container aisle space, wastes stored beyond 90 days, and weekly inspection log have now been corrected. The question on your company's plating operation has also been clarified and answered.

According to analytical data on the wastewater discharged from the plating operation, it appears that your company is not discharging any hazardous waste/hazardous constituents to the sewer or storm systems that does not meet effluent discharge limits. Your company is operating under a NPDES permit.

Your facility is now considered to be in satisfactory compliance with applicable State and Federal Hazardous Waste Rules and Regulations.

Sincerely,

Chul Kim-McGuire
Division of Solid & Hazardous Waste Management

cc: Dave Sholtis, CO, DSHWM



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr
Columbus, Ohio 43266-0149



RECEIVED

CERTIFIED MAIL

AUG 16 1988

Richard F. Celeste
Governor

Mr. Ike Beediwala
Plant Engineer
TRW, Inc.
1784 Stanley Avenue
Dayton, Ohio 45404

Dear Mr. Beediwala:

It has been brought to my attention by staff of the Ohio EPA Southwest District Office that TRW, Inc. was cited by letter dated June 24, 1988, for violations of Ohio's hazardous waste laws, specifically, rules 3745-65-35, 3745-66-74, and 3745-52-34. After consulting with me in order to initiate an enforcement action against TRW, Inc. for the cited violations, SWDO personnel were able to later report to me that your facility had "returned to compliance." On August 5, 1988, the District staff again confirmed your present compliance and I can in turn report to you that no enforcement action is contemplated at this time.

I am writing to you to express my concern that the file compiled in anticipation of enforcement action shows that TRW, Inc. has over a period of time several times violated rule 3745-52-34 of the Administrative Code concerning storage of hazardous wastes in excess of 90 days. TRW, Inc. is not licensed for hazardous waste storage at the Dayton, Ohio facility. A thorough weekly inspection of containers is warranted, with appropriate notation of accumulation starting dates.

The hazardous waste management regulatory program is not a new program, especially that part of hazardous waste rules applicable to generators. As a generator of hazardous waste which has been the subject of several Ohio EPA inspections, TRW, Inc. should understand and comply with these rules. If subsequent inspection by Ohio EPA discloses violations, the Agency will again consider an enforcement action, including payment of a penalty.

Very truly yours,

Jennifer Tiell
Jennifer Tiell
Assistant Legal Advisor

cc: Michael Savage, DSHWM
Dave Sholtis, DSHWM
Don Marshall/Jeff Hines/Chul Kim-McGuire, SWDO